

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CRUZ VALDIVIESO FIGUERA,**

Plaintiff,

Case No. 0:22-cv-61553-WPD

v.

**ALL VIP CARE INC., et.al,**

Defendants.

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**DEFENSE COUNSEL’S MOTION TO WITHDRAW**

Pursuant to Local Rule 11.1(d)(3) of the United States District Court for the Southern District of Florida and Rule 4-1.16 of the Florida Rules of Professional Conduct, undersigned counsel, Michael Alexander Hurckes, Esq., hereby respectfully moves to withdraw as counsel of record for Defendant Liz Velazquez McKinnon, and in support thereof states the following:

1. Undersigned counsel is currently unable to continue representation due to serious illness and ongoing professional incapacity, which renders continued representation impractical and ethically improper at this time.
2. The case is currently pending before the Court, with a hearing set for July 28, 2025 at 10:00 A.M. on Plaintiff’s:
  - Motion for Default Judgment [ECF No. 195],
  - Motion for Order to Show Cause [ECF No. 201], and
  - Motion for Writ of Execution [ECF No. 202].

3. Undersigned counsel has provided notice to the Defendants regarding the intent to withdraw and has advised them to retain substitute counsel immediately in order to avoid prejudice and ensure compliance with Court orders and deadlines.
4. Pursuant to Local Rule 7.1(a)(3), undersigned counsel has conferred with Plaintiff's counsel, Brian H. Pollock, Esq., regarding this Motion, and Plaintiff does not object to the withdrawal.

WHEREFORE, undersigned counsel respectfully requests that this Court enter an Order:

- Granting this Motion to Withdraw as counsel for Defendants;
- Relieving Michael Alexander Hurckes, Esq. of all further responsibility in this case; and
- Directing the Defendants to promptly retain new counsel or, if applicable, notify the Court of their intent to proceed pro se (noting that corporate entities must appear through counsel).

**Dated:** July 28, 2025

Respectfully submitted,  
**Michael Alexander Hurckes, Esq.**  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this July 28, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, and that a true and correct copy was served on all counsel of record via CM/ECF and on Defendants via U.S. Mail and electronic mail at their last known addresses.

**Michael Alexander Hurckes, Esq.**

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